

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**NATIONAL RIFLE ASSOCIATION OF
AMERICA,**

Plaintiff and Counter-Defendant

v.

ACKERMAN MCQUEEN, INC.,

Defendant and Counter-Plaintiff,

and

**MERCURY GROUP, INC., HENRY
MARTIN, WILLIAM WINKLER, AND
MELANIE MONTGOMERY**

Defendants.

Case No. 3:19-cv-02074-G

ACKERMAN MCQUEEN, INC.'S AMENDED TRIAL EXHIBIT LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A) and the Court's October 13, 2020 Scheduling Order (ECF 174), as amended (ECF 358), Defendant/Counter-Plaintiff Ackerman McQueen, Inc. ("AMc") and Defendants Mercury Group, Inc. ("Mercury"), Henry Martin ("Martin"), William Winkler ("Winkler"), and Melanie Montgomery ("Montgomery") (collectively, "AMc") hereby submit their *Amended Trial Exhibit List*.

AMc may, at its sole election, request that the Court take judicial notice of, or otherwise offer any of, the below listed documents into evidence at the time of the trial. AMc further reserves the right to offer any documents, which may be designated or offered by the NRA. AMc, in its sole discretion, additionally reserves the right to offer or use any exhibits (whether designated below or by the NRA) as may be necessary for cross-examination, impeachment, or rebuttal. AMc further reserves the right to supplement or amend this exhibit list at any time.

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
001	4/30/2017	2017 Services Agreement between NRA and AMc	AM 00000162			X
002	5/6/2018	Amendment #1 to Services Agreement	AMc-056592			X
003	5/11/2018	NRA v. Cuomo, et al., Original Complaint (N.D. N.Y.)				
004	5/29/2018	NRA v. Lockton, Original Complaint (E.D. Virginia)				
005	7/20/2018	NRA v. Cuomo, et al., Amended Complaint (N.D. N.Y.)				
006	9/13/2018	Order revoking of <i>pro hac vice</i> (E.D. Virginia)			FRE 403 – Precludes the admission of evidence that wastes time or is more prejudicial than probative; i.e., whose probative value is outweighed by the possibility of unduly prejudicing the jury – in this case against Plaintiff and Plaintiffs' attorneys. FRE 401, 402 – Precludes admission of irrelevant evidence, which is evidence that has no tendency to make the existence of any fact that is of consequence to the determination of the action more probable or	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					less probable than it would be without the evidence. FRE 404 – Precludes admission of evidence that constitutes improper character evidence.	
007	4/12/2019	NRA v. AMc, Original Complaint (Virginia State Court - CL19001757)				X
008	5/22/2019	NRA v. AMc, Original Complaint (Virginia State Court - CL19002067)				X
009	6/19/2019	NRA v. Col. North, Original Complaint (NY State Court)				
010	8/30/2019	NRA v. AMc, et al., Original Complaint (N.D. Tex.)				
011	9/5/2019	NRA v. AMc, Original Complaint (Virginia State Court - CL19002886)				
012	8/6/2020	NYAG v. NRA, et al., Original Complaint (NY State Court)				
013	2/23/2021	NYAG v. NRA, et al., Wayne LaPierre Verified Answer				
014	5/11/2021	Order Granting Motions to Dismiss (B.K. N.D. Tex.)				X
015		Audit Documents	AMc-0028792 - AMc-0034631		Exhibit 15 appears to be a disaggregated collection of copies of materials produced in a hard copy format, certain of which appear to be generated from electronic platforms in use by AMc. This “exhibit” contains over 2,600 pages combining hundreds of different documents. The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
016	3/30/2017	Email from Steve Hart to Bill Winkler	Hart Ex. 17			X
017	5/23/2018	NRA Supplier Meeting Agenda	NRA-AMC_00200788		FRE 901 – Proper authentication of handwritten notes and financial statements requires testimony by person with requisite knowledge that the notes and statements are an accurate depiction of the intended subject.	
018	4/14/2017	Email from Bill Winkler to Steve Hart	AMcTX-0065465			X
019	4/20/2017	Email from Bill Winkler to Steve Hart	Hart Ex. 19			X
020	1/16/2018	Email from Josh Powell to Andrew McKenna, Tony Makris, and Colleen Gallagher	AMc-035712		FRE 401, 402 – Precludes admission of irrelevant evidence, which is evidence that has no tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.	
021	3/28/2018	Correspondence from John Frazer to Lacey Cremer and Melanie Montgomery	AMcTX-0000009			X
022	4/24/2019	Letter from Wayne LaPierre to John Frazer and Charles Cotton	NRA-AMC_00200450			X
023	4/13/2018	Email from Bill Brewer to Angus McQueen	AMcTX-00037265			X
024	4/23/2018	Email from Tony Makris to Steve Hart and others	AMc-044429			
025		2019 Budget for C. Spray	NRA-AMC_00200742			X
026	5/11/2018	Email from Bill Winkler to Woody Phillips	AMcTX-00000027			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
027	5/21/2018	Email from Melanie Montgomery to Bill Winkler and Susan LaPierre	AMcTX-00002090		FRE 802 – Hearsay FRE 401, 402 – Precludes admission of irrelevant evidence, which is evidence that has no tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.	
028	5/25/2018	Email from Josh Powell to Tony Makris	AMcTX-00065337		FRE 401, 402 – Precludes admission of irrelevant evidence, which is evidence that has no tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.	
029		2018 Budget – Revised	NRA-AMc_00200745			X
030	7/10/2018	Email from Steve Hart to Melanie Montgomery	Hart Ex. 6			X
031	7/10/2018	Email from Steve Hart to Melanie Montgomery	AMcTX-00041549			X
032	2/6/2019	Emails between Jessica Bradley and Bill Winkler	AMc-057912		The NRA reserves the right to object to the use of this document at trial as inadmissible hearsay (FRE 802) in the event Jessica Bradley does not testify at trial.	
033	7/13/2018	Email from Sonya Rowling to Rick Tedrick	NRA-AMc_00063924			X
034	7/13/2018	Letter from Jay Madrid to Bill Brewer	AMcTX-00065338			X
035	4/28/2019	Email from Steve Hart to Michael Volkov	NRA-AMc_00185755			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
036	8/6/2018	Email from Tony Makris to Melanie Montgomery, Henry Martin, and Angus McQueen	AMcTX-00065357			X
037	8/7/2018	Letter from Jay Madrid to Bill Brewer	AMcTX-00065369			X
038	8/8/2018	Letter from Bill Brewer to Jay Madrid	AMcTX-00065352		FRE 106 – A document must be admitted in its entirety. The document is referencing attachments. Accordingly, the attachments should, in fairness, be considered part of the correspondence and should be admitted along with said correspondence.	
039	8/8/2018	Letter from Woody Phillips to Bill Winkler	NRA-AMc_00068307			X
040	8/8/2018	Correspondence from Woody Phillips to Bill Winkler	NRA-AMc_00068309			X
041	1/19/2019	Email from Susan Dillon to Sarah Rogers	NRA_AM_FRA_0013029			X
042	8/13/2018	Letter from Bill Winkler to Woody Phillips	NRA-AMc_00063983			X
043	8/14/2018	Letter from Woody Phillips to Bill Winkler	NRA-AMc_00057152			X
044	8/15/2018	Letter from Bill Winkler to Woody Phillips	NRA-AMc_00057176			X
045	8/17/2018	Email from Travis Carter to Andrew Arulanandam and Jennifer Baker	AMcTX-00065360			X
046	8/22/2018	Letter from Stephen Ryan to Bill Brewer	AMcTX-00065340			X
047	8/27/2018	Letter from Bill Winkler to Woody Phillips	NRA-AMc_00071260			X
048	8/28/2018	Letter from Bill Winkler to Woody Phillips	AMc-058391			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
049	8/29/2018	Letter from Woody Phillips to Bill Winkler	NRA-AMc_00057263			X
050	9/24/18	Angus McQueen Draft Letter to Wayne LaPierre	AMc-058564			X
051	9/4/2018	Letter from Bill Winkler to Woody Phillips	AMc-057593			X
052	9/5/2018	Letter from Jay Madrid to Bill Brewer	AMcTX-00065354			X
053	9/6/2018	Email from Stephen Ryan to Bill Brewer	AMcTX-00065362			
054	9/12/2018	Letter from Bill Winkler to Woody Phillips	AMcTX-00000200			X
055	9/12/2018	Letter from Bill Brewer to Jay Madrid	AMcTX-00065346			X
056	9/13/2018	Email from John Frazer to Gina Betts and Sarah Rogers	NRA-AMc_00064053			X
057	9/13/2018	Email from D. Reno to L. Supernaugh	NRA-AMc_00068484			X
058	9/14/2018	Email from Sarah Rogers to Gina Betts and John Frazer	NRA-AMc_00057268			X
059	9/17/2018	Email from Lacey Cremer to Craig Spray, Melanie Montgomery, and Nader Tavangar	AMc-031560			X
060	9/21/2018	Email from Lisa Supernaugh to AMc	AMc-028858		The NRA objects on the grounds that parts of the document are not easily legible (FRE 106 – A document must be admitted in its entirety). The NRA requests that a legible, higher-resolution copy of the document is used.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
061	9/24/2018	Letter from Bill Winkler to Craig Spray	NRA-AMc_00057300			X
062	9/25/2018	Letter from Jay Madrid to Steve Hart	AMcTX-00065322			X
063	9/25/2018	Letter from Wayne LaPierre to Bill Winkler	NRA-AMc_00057314			X
064	9/25/2018	Letter from Josh Powell to Bill Winkler	NRA-AMc_00057315			X
065	9/25/2018	Letter from Bill Winkler to Josh Powell	NRA-AMc_00057329			X
066	9/26/2018	Email from Steve Hart to Tony Makris	Hart Ex. 11			X
067	9/28/2018	Letter from Bill Winkler to Josh Powell	AMc-031718		The NRA objects on the grounds that the proposed budget adjustments attachment that is attached to the letter is illegible (FRE 106 – A document must be admitted in its entirety). The NRA requests that a legible, higher-resolution copy of the document is used.	
068	10/2/2018	Letter from Bill Winkler to Josh Powell	AMc-043863			X
069	10/2/2018	Letter form Richard Sayles to Steve Hart	NRA-AMc_00160786			X
070	10/4/2018	Correspondence from Josh Powell to Bill Winkler	NRA-AMc_00057377			X
071	10/4/2018	Correspondence from Wayne LaPierre to Bill Winkler	NRA-AMc_00060919			X
072	10/5/2018	Letter from Bill Winkler to Craig Spray	AMc-034913			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
073	10/6/2018	Letter from Craig Spray to Bill Winkler				X
074	10/9/2018	Letter from Bill Winkler to Craig Spray	AMc-058072			X
075	10/11/2018	Email between Steve Hart and Tony Makris	Hart Ex. 14			X
076	10/16/2018	Correspondence from Wayne LaPierre to Bill Winkler	NRA-AMc_00090636			X
077	10/31/2018	Email from Todd Grable to AMc Team	AMc-037921			X
078	10/31/2018	Email from Craig Spray to Bill Winkler and Melanie Montgomery	AMc-059342			X
079	11/2/2018	Email from Craig Spray to Melanie Montgomery	AMcTX-00000333			X
080	11/16/2018	Email from Nicole Reaves to Lacey Cremer and Bill Winkler	AMcTX-00065308			X
081	2/4/2016	Email from Trisha Parker to Melanie Montgomery	AMcTX-00065138			X
082	11/26/2018	Email from Craig Spray to Melanie Montgomery and Lacey Cremer	AMcTX-00000776			X
083	12/6/2018	Text Message from Craig Spray to Melanie Montgomery	AMcTX-00064686		This document is hearsay and inadmissible pursuant to FRE 802. This document does not indicate the identity of the sender, the recipient or the date of the purported communications. The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901. The NRA objects to the use of this document at trial as it was not produced in its native form.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					FRE 401, 402 – Precludes admission of irrelevant evidence, which is evidence that has no tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence. This document is not probative to adjudicating a material disputed fact relevant to any claim or defense in this lawsuit.	
084	12/14/2018	Correspondence between Steve Hart and Tony Makris	AMc-044420			X
085	12/20/2018	Email from Bill Winkler to Craig Spray	NRA-AMc_00112506			X
086	12/21/2018	Letter from Sarah Rogers to Jay Madrid	NRA-AMc_00068870			X
087	1/4/2019	Letter from Jay Madrid to Steve Hart	NRA-AMc_00065378			X
088	1/7/2019	Email from Oliver North to AMc	AMc-039381		The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.	
089	1/10/2019	Letter from Stephen Ryan to Steve Hart	Hart Ex. 23			X
090	1/17/2019	Email between Stephen Ryan, John Frazer, and Steve Hart	NRA-AMc_00058457			X
091	1/21/2019	Emails between Stephen Ryan, Steve Hart, and John Frazer	NRA_AM_FRA_0002614			X
092	1/22/2019	Emails between Stephen Ryan, Steve Hart, and John Frazer	NRA-AMc_00058512			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
093	1/30/2019	Email from John Frazer to Stephen Ryan	NRA-AMc_00058587			X
094	1/31/2019	Emails between John Frazer, Stephen Ryan, and Gina Betts	NRA-AMc_00058659			X
095	2/3/2019	Email from John Frazer to Gina Betts	NRA_AM_FRA_0000668			X
096	2/6/2019	Email from Susan Dillon to FRA Employee	NRA_AM_FRA_0001437			X
097	2/6/2019	Email from Jessica Bradley to Bill Winkler	NRA_AM_FRA_0001449		The NRA reserves the right to object to the use of this document at trial as inadmissible hearsay (FRE 802) in the event Jessica Bradley does not testify at trial.	
098	2/6/2019	Email from Bill Winkler to Jessica Bradley	NRA_AM_FRA_0001451			X
099	2/8/2019	Emails between Bill Winkler and Jessica Bradley	NRA_AM_FRA_0001490			X
100	2/8/2019	Correspondence from John Frazer to Stephen Ryan and Gina Betts	NRA-AMc_00064546			
101	2/11/2019	Letter from Stephen Ryan to John Frazer	AMcTX-00065329			X
102	2/12/2019	Letter from John Frazer to Stephen Ryan	AMcTX-00065330			X
103	2/6/2022	In the Matter of Dana Loesch v. AMc: Partial Final Award	AMcTX-0339422		The NRA objects to this document as AMc and its counsel failed to disclose any documents concerning this arbitration during discovery. As a result of its tactical partial disclosure of this "Partial Final Award," AMc should be precluded from using this document at trial. The NRA should be permitted to use it in any way it sees fit.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
104	2/18/2019	Emails between Jessica Bradley, Bill Winkler, and Gina Betts	NRA_AM_FRA_0001954		The NRA reserves the right to object to the use of this document at trial as inadmissible hearsay (FRE 802) in the event Jessica Bradley does not testify at trial.	
105	7/29/2015	Email from Melanie Hill to Trisha Parker	AMcTX-00065414			X
106	2/20/2019	Email from John Frazer to Stephen Ryan and Gina Betts	NRA-AMc_00059149			X
107	2/22/2019	Email from Steve Hart to Tony Makris	Hart Ex. 36			X
108	2/22/2019	Emails from Susan Dillon to Sarah Rogers	NRA_AM_FRA_0002037			X
109	2/26/2019	Letter from Oliver North, Richard Childress, and Carolyn Meadows to Wayne LaPierre	N2-00050		The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).	
110	2/26/2019	Emails between Steve Hart and Anthony Makris	AMcTX-00011318			X
111	2/26/2019	Emails between Stephen Ryan and John Frazer	NRA-AMc_00059246			X
112	2/26/2019	Correspondence from Wayne LaPierre to Oliver North	NRA-AMc_00064573			X
113	3/4/2019	Letter from John Frazer to Stephen Ryan	Frazer Ex. 30			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
114	3/7/2019	Email from Melanie Montgomery to Craig Spray	AMc 001275			X
115	3/7/2019	Email from Stephen Ryan to John Frazer	NRA-AMC_00059288			X
116	7/7/2021	Email from Trisha Parker to Melanie Montgomery	AMcTX-65143		An exhibit must be admitted in its entirety (FRE 106). Here, in the lower email, there is a reference to an “attached” affidavit from Fox News, which we do not see. That affidavit must be attached so that the jury can see the complete picture. The NRA will withdraw this objection if/when the referenced affidavit has been attached.	
117	3/8/2019	Email from Stephen Ryan to John Frazer	NRA-AMC_00059305			X
118	3/11/2019	Email from Tony Makris to John Frazer	AMc-035260			X
119	3/11/2019	Message from Wayne LaPierre to NRA Board	AMc-035262			X
120	3/12/2019	Correspondence from Jay Madrid to John Frazer	AMcTX-00065364			X
121	3/14/2019	Letter from John Frazer to Jay Madrid	AMc-035264			X
122	3/4/2019	2019 Billing Schedule for C. Spray	NRA-AMC_00200736			X
123	3/21/2019	Correspondence from Brendan Sullivan to Bill Brewer	OLN00208			X
124	3/22/2019	Email from Oliver North to John Frazer	Meadows Ex. 2		The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					North's testimony and communications at trial. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).	
125	3/22/2019	Correspondence from Oliver North to Bill Brewer	NRA-AMC_00069015		The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.	
126	3/22/2019	Correspondence from Oliver North to NRA Audit Committee	North Ex. 14		The NRA objects to the use of this document at trial. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403). This document is also illegible in the form presented.	
127	3/25/2019	Letter from John Frazer to Stephen Ryan	AMcTX-00065371			X
128	3/25/2019	Correspondence from John Frazer to Oliver North	Frazer Ex. 42			X
129	3/25/2019	Correspondence from Bill Brewer to Brendan Sullivan	OLN00214			
130	11/2/2018	Email from Craig Spray to Melanie Montgomery and Bill Winkler	NRA-AMc_00057619			
131	3/26/2019	Letter from John Frazer to Stephen Ryan	AMcTX-00065332			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
132	3/29/2019	Letter from Wayne LaPierre to NRA Board	NRA-AMC_00191401			
133	3/31/2019	Correspondence from Oliver North to Wayne LaPierre	OLN00216		The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).	
134	4/3/2019	Correspondence from Wayne LaPierre to Oliver North	OLN0221		The NRA objects to Defendants' use of this document at trial. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).	
135	4/4/2019	Email from Steve Hart to Tony Makris	AMcTX-00011450			
136	4/8/2019	Correspondence from Oliver North to Wayne LaPierre	OLN00225; NRA-AMC_00199755		The NRA objects to Defendants' use of this document at trial. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).	
137	4/9/2019	Correspondence from Oliver North to Wayne LaPierre	OLN00173		The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
138	4/10/2019	Email from Andrew Arulanandam to Melanie Montgomery	AMcTX-00000581			X
139	4/11/2019	Correspondence from Oliver North to John Frazer and Charles Cotton	NRA-AMc_00069094; NRA-AMc_00059415			X
140	4/12/2019	Email from Charles Cotton to Oliver North	NRA-AMc_00059433			X
141	5/7/2019	An Internal Memo Raises New Questions About Self-Dealing at the NRA by Mark Spies				
142	4/15/2019	Message from Wayne LaPierre to NRA Board	DB_0216			
143	4/15/2019	Email from Danny Hakim to Andrew Arulanandam	NRA-AMc_00069104			X
144	4/30/2019	Concur Expense Report	AMcTX-00067318		This “exhibit” contains 365 pages combining dozens individual documents. The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.	
145	4/18/2019	Correspondence from Oliver North and Richard Childress to John Frazer and Charles Cotton	OLN00185; NRA-AMc_00200725		The NRA objects to Defendants’ use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North’s testimony and communications at trial. The amount of attorney’s fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).	
146	4/18/2019	Text Message from Allen West to Millie Hallow	OLN00367		The NRA objects to AMc’s use of this exhibit at trial. This document is a	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					compilation of text messages which were never produced in native form.	
147	4/22/2019	Letter from Wayne LaPierre to Mark Dycio	AMcTX-00065334			X
148	4/22/2019	Letter from Wayne LaPierre to Steve Hart	AMc-035391			X
149	4/22/2019	Email from Steve Hart to NRA Executives and Board Members	OLN00015			X
150	4/22/2019	Letter from Bill Winkler to Craig Spray	NRA-AMc_00069698		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
151	4/22/2019	Letter from Bill Winkler to Tyler Schropp	LaPierre Ex. 21		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
152	4/22/2019	Letter from Bill Winkler to Craig Spray	AMc 001304		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
153	4/22/2019	Message from Wayne LaPierre to NRA Board	OLN00076			X
154	4/24/2019	Email from Millie Hallow to Oliver North	NRA-AMc_00061214			X
155	4/25/2019	Email from Oliver North to John Frazer	NRA-AMc_200692		The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.	
156	4/25/2019	Letter from Wayne LaPierre to NRA Board	NRA-AMc_00161960			X
157	4/25/2019	Correspondence from Oliver North to NRA Board and Executive Council	OLN00093		The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
158	4/25/2019	Correspondence from Oliver North to NRA Executive Committee	NRA-AMc_00200692		The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).	
159	4/25/2019	Email from Eric Van Horn to Caitlin Fiandt, John DaSilva, Cameron Collins, and Woody Arenas	AMc-041806		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
160	4/26/2019	Email from Steve Hart to John Frazer and Wayne LaPierre	NRA-AMc_00059559			X
161	4/27/2019	Email from John Frazer to NRA Board	NRA-AMc_00140486			X
162	4/27/2019	Statement from Wayne LaPierre to NRA Board	OLN00106			X
163	5/5/2019	Email from Wayne LaPierre to Melanie Montgomery	NRA-AMc_00064984			X
164	5/6/2019	Letter from Bill Winkler to Craig Spray	AMc 001309		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					<p>during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
165	5/9/2019	Email from Andrew Arulanandam to Melanie Montgomery and Henry Martin	NRA-AMc_00059652			
166	5/10/2019	Email from Melanie Montgomery to Andrew Arulanandam	NRA-AMc_00086579		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
167		Projected Increases to NRA Fees	AMcTX-0067704			X
168	5/13/2019	Email from Melanie Montgomery to Andrew Arulanandam	NRA-AMc_00124518		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					<p>the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
169	5/22/2019	Letter from Carolyn Meadows and Charles Cotton to NRA Members	NRA-AMc_00199649			X
170	5/24/2019	Correspondence from Andrew Arulanandam to Melanie Montgomery	NRA-AMc_00059838			X
171	5/29/2019	Notice of Termination of Services Agreement from AMc to NRA	NRA-AMc_00059931			X
172	5/30/2019	Letter from Melanie Montgomery to Andrew Arulanandam	NRA-AMc_00059946		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
173	6/3/2019	Email from Bill Winkler to Craig Spray	NRA-AMc_00065094		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently</p>	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
174	6/3/2019	Email from Bill Winkler to Craig Spray	NRA-AMc_00059982		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
175	6/3/2019	Email from Bill Winkler to Craig Spray	AMcTX-00065350		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
176	6/18/2019	Emails from David Schertler to Andrew Arulanandam, Melanie	Arulanandam Ex. 6		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
		Montgomery, Angus McQueen, and Revan McQueen			during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
177	6/25/2019	Correspondence from Andrew Arulanandam to Dana Loesch	NRA-AMc_0019094			X
178	6/25/2019	Notice of Termination of Services Agreement from Andrew Arulanandam	NRA-AMc_00060185			X
179	7/22/2019	Letter from NRA Board Members to Carolyn Meadows, John Frazer, and NRA Board	AMcTX-00065468		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
180	9/27/2019	Letter from Melanie Montgomery to Andrew Arulanandam				X
181	10/25/2019	Letter from John Frazer to Gina Betts, Bill Winkler, and Rick Tedrick	AMcTX-00045606			

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
182	7/22/2021	All Invoices – NR Analysis	AMcTX-00067978		Authentication (FRE 901) – the exhibit requires testimony that it accurately represents what it purports to be. Hearsay (FRE 802)	
183	12/12/2019	Text Messages from Bill Brewer	GRANT0161		The NRA objects as this document was not produced in its native form. These are pictures of purported text messages. The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.	
184	6/5/2019	Email from Nader Tavangar to Rick Tedrick and Duane Reno	AMc-042077		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
185	2/4/2021	Order Denying Motion to Transfer (<i>In re National Rifle Association Business Expenditures</i>)			Relevance (FRE 401-402). This is a procedural order from a different litigation that is irrelevant to this litigation.	
186	1/14/2021	Letter from Brewer Attorneys & Counselors to John Frazer	NRA-BK-00060928		The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).	
187	4/5/2018	Email from Travis Carter to NRA	AMc-035792		Relevance (FRE 401-402).	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					The fact that the Brewer firm did or did not issue a statement related to any particular pending matter has no bearing on any disputed fact relevant to a claim or defense in this case.	
188	10/6/2016	2017 Budget Planning Document	NRA-AMc_00057337			X
189	2/8/2019	Email from Bill Winkler to Jessica Bradley	AMc-057923			X
190	4/23/2018	Deal Points for Oliver North Employment Agreement	OLN00398			X
191	5/15/2018	Employment Agreement by and among AMc and Oliver North	AMc-056595			X
192	5/21/2018	Invoice No. 001 from WBB Investments, LLC	AMcTX-00036157			X
193	8/22/2019	NRA Shakes Up Legal Team Amid Intensifying War by Robert Costa				X
194	7/6/2021	Dorsey & Whitney LLP Invoices (Dallas Action)	AMcTX-00065644		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
195	9/8/2018	NRA Report of the Audit Committee	OLN00178			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
196	2/8/2019	Email from Bill Winkler to Jessica Bradley	NRA-AMc_00064536			X
197	10/24/2018	NRA Presidential Advisors Agenda	NRA-AMc_00057543		FRE 401-402 – This document does not help to resolve any disputed material fact relevant to a claim or defense.	
198	12/4/2018	Revised 2019 Budget	AMcTX-00065137			
199	10/4/2018	Letter from Josh Powell to Bill Winkler	NRA-AMc_00057377			
200	1/1/2019	Amendment 1 to Oliver North Employment Agreement	AMc-059822			X
201	1/4/2019	NRA Board Meeting Presentation				X
202	1/18/2019	FRA/NRA Agreement	Trahar Ex. 1A			X
203	2/5/2019	List of AMc Employees who worked on NRA Account	NRA-AMc_00193859			X
204	3/4/2019	Spreadsheet Prepared by Melanie Montgomery	AMcTX-000065136			X
205	6/8/2021	Dorsey & Whitney LLP Invoices (Loesch Arbitration)	AMc-TX-00066503		The NRA objects to this document as AMc and its counsel failed to disclose any documents concerning this arbitration during discovery.	
206	3/21/2019	Memo from Morgan Lewis Bockius LLP to NRA Officers	NRA-BK-00177963		This document concerns legal fees charged by the NRA's counsel. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).	
207	4/15/2019	NRA Invoices and Related Emails	Supernaugh Ex. 8			X
208	4/29/2019	Email from Andrew Arulanandam to Fischer	NRA-AMc_00059584			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
209	10/5/2018	Letter from Craig Spray to Bill Winkler	AMcTX-00000296			X
210	7/15/2019	Memorandum prepared by Emily Cummins	LaPierre Ex. 16		FRE 403 – More Prejudicial Than Probative.	
211	1/4/2020	Invoice for Professional Services from Brewer Attorneys & Counselors	NRA-BK-00061283		This document concerns legal fees charged by the NRA's counsel. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).	
212	1/10/2020	FRA Updated Privilege Log				
213		NRA Second Amended Privilege Log				X
214	1/11/2016-12/19/2016	American Express Credit Card Statement of Tyler Schropp	AM 00000987			X
215	9/9/2019	Dorsey & Whitney LLP (Professional Fundraising Counsel Registrations)	AMcTX-00066490		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
216	4/17/2019	Article titled "Secrecy, Self-Dealing and Greed at the NRA"				X
217	4/26/2019	Article titled "NRA's Wayne LaPierre Says He is Being Extorted,				X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
		Pressured to Resign" in The Wall Street Journal				
218	4/26/2019	Email from David Valinski	Frazer Ex. 66			X
219	5/6/2019	Article titled "Advocacy as Art: Lawyers Must Engage in Issues and Crisis Management"			Relevance (FRE 401-402). An article authored by counsel for the NRA lacks probative value.	
220		Zillow Listing	LaPierre Ex. 27			X
221	12/5/2018-1/14/2021	Invoices for Professional Services from Brewer Attorneys & Counselors	NRA-BK-00060718		Relevance (FRE 401-402) Waste of Time (FRE 403). Professional invoices from Plaintiff's counsel have no relevance to this litigation.	
222	5/1/1999	Services Agreement by and among NRA and AMc	NRA-AMc_00048503			X
223		2015 Freestyle Network Screenshot	AMcTX-00067936			X
224		NRA Media Projects Screenshot	AMcTX-00067937			X
225	1/3/2017	Invoice from Corporate America Aviation, Inc.	Cotton Ex. 10			X
226	1/2/2018	Email from Josh Powell to Tony Makris	AMc-029887			X
227		AMc Invoice Backup Spreadsheet	AMcTX-00067933		The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.	
228	11/9/2018	Email from Nicole Reaves to Bill Winkler, Melanie Montgomery, and Lacey Cremer	AMc-TX0065297		Hearsay (FRE 802).	
229		Attachment from Nicole Reeves			The NRA reserves the right to object to the admission of this document into evidence at	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					trial subject to a proper authentication pursuant FRE 901.	
230	4/13/2017	AMc Invoice No. 148177	NRA-NYAG-00013071			X
231	2018	2018 NRA Budget	AMcTX-00065392			X
232		Media Buy Transaction Ledger	AMcTX-00067934		The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.	
233	10/16/2018	2018 / 2019 Budget Comparison	AMcTX-00065376			X
234	4/15/2019-7/22/2021	Invoices from 2019-2021	AMcTX-00065401			X
235	10/11/2018	Letters from Bill Winkler to Oliver North and from Jay Madrid to Steve Hart	AMcTX-00065396			X
236	1/2/2018	Email from Josh Powell to Tony Makris	AMcTX-00065335			X
237	12/6/2016	2017 Budget	AMcTX-00065394			X
238	11/18/2015	2016 Budget	AMcTX-00065395			X
239	5/13/2019	Letter from Melanie Montgomery to Andrew Arulanandam	AMcTX-00003309		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.	

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					AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
240	1/24/2019	Email from Melanie Montgomery to Craig Spray	AMc-001227			X
241	10/9/2018	NRATV 2018 YTD: Analytics Executive Overview	AMc-002700		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
242	1/1/2018 - 3/31/2018	NRATV Q1 2018: Analytics & Valuation	AMc-002713		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined	

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					from the social media accounts, to which the NRA has also been denied access.	
243	10/1/2016-12/20/2017	NRATV Analytics	AMc-002741		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
244	1/1/2018 - 10/3/2018	NRATV YTD Q3'18: Analytics	AMc 002772		FRE 901 -- Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
245	10/1/2016-8/31/2017	NRATV Analytics Discussion	AMc 002818		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay	

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					The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
246	n/a	NRATV 2018 Vision Discussion	AMc 002835		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
247	4/7/2019	NRATV 2019 Update	AMc 002844		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which	

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					the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
248	n/a	The Power of NRATV – Crafting and Owning a Narrative	AMc 002853		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
249	n/a	The Clenched Fist of Truth	AMc 002929		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
250	n/a	NRA America's Most Patriotic Brand	AMc 002956		FRE 901 – Lack of Proper Authentication	

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					FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
251	n/a	NRATV Commentators – 2017 Metrics	AMc-039158		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
252	n/a	NRATV LOVE AT FIRST SHOT 2017 Metrics	AMc-039162		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
253	n/a	NRATV Cam & Company – 2018 Metrics	AMc-040053		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
254	n/a	NRATV Monetization Report	AMcTX-00000763		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined	

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					from the social media accounts, to which the NRA has also been denied access.	
255	5/31/2019	Email from Andrew Arulanandam to Melanie Montgomery, Lacey Cremer, Bill Winkler, Wayne LaPierre, Craig Spray, and John Frazer	NRA-AMC_00059956			
256	5/5/2019	Email from Nader Tavanger to Rick Tedrick and Duane Reno	AMC-042077		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
257	4/16/2019	Email to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	AMC-TX-00019288			X
258	6/12/2019	Email to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	NRA-AMC_00079124			X
259	11/19/20	NRA 2020 IRS Form 990				X
260	2/22/2019	Email from Craig Spray to Nader Tavangar and Bill Winkler	AMC-001257			X
261	10/8/2018	Letter from Bill Winkler to Craig Spray	AMC-058072			X
262	1/1/2018	Employment Agreement by and among Dana Loesch and AMc	AMC 000055			X
263	2/22/2021	NRA Organizational Chart				X

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264	4/22/2019	Letter from Bill Winkler to Wayne LaPierre	NRA-AMc_0091615		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
265	4/22/2019	Letter from Bill Winkler to Wayne LaPierre	NRA-AMc_00091621		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
266	n/a	List of NRA Audit Committee Top Concerns	NRA-AMc_00063924			X
267	5/7/2018	Text Messages from the Phone of Woody Phillips	AMcTX-00065643			X
268	5/3/2018	Text Messages from the Phone of Woody Phillips	AMcTX-00065642			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
269	7/13/2018	Email from Nader Tavanger to Woody Phillips, Lisa Supernaugh, and Duane Reno	AMc-036282			X
270	2/20/2018	Pay Stubs and Electronic Deposit Stubs	NRA-AMc_00052128			X
271	6/7/2018	Email from Craig Spray to Woody Phillips	NRA-AMc_00051582			X
272	5/30/2019	Email from M. Erstling to Craig Spray, Sonya Rowling, and Lisa Supernaugh	NRA-AMc_00125414			X
273	4/2/2019	Email from Nader Tavanger to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	NRA-AMc_00079067			X
274	3/4/2019	Email from Nader Tavanger to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	NRA-AMc_00079029			X
275	6/5/2019	Letter from Andrew Arulanandum to Bill Winkler	NRA-AMc_00059992			X
276	6/6/2019	Email from David Schertler to Andrew Arulanandum	NRA-AMc_00060001			X
277	6/4/2019	Email from David Schertler to John Frazer	NRA-AMc_00059986		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
278	6/3/2019	Email from Bill Winkler to Craig Spray	NRA-AMc_00059983		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
279	6/7/2019	Email from Andrew Arulanandum to David Schertler	NRA-AMc_00060115			
280	6/10/2019	Email from David Schertler to Andrew Arulanandum	NRA-AMc_00060118			X
281	6/11/2019	Email from Andrew Arulanandum to David Schertler and Melanie Montgomery	NRA-AMc_00060122			
282	6/14/2019	Email from Andrew Arulanandum to David Schertler	NRA-AMc_00060125			
283	06/27/2019	Letter from David Schertler to Andrew Arulanandum			The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					discovery period, when the NRA could have made use of it.	
284	10/10/2019	Email from Nader Tavangar to Craig Spray and others regarding October invoice	NRA-AMC_00127308 - 309		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
285	n/a	Summary of NRA Billing	AMcTX-00067978 - 68006			X
286	11/10/2016	NRA 2015 IRS Form 990				X
287	9/18/2017	NRA 2016 IRS Form 990				X
288	11/05/2018	NRA 2017 IRS Form 990				X
289	11/14/2019	NRA 2018 IRS Form 990				X
290	11/17/2020	NRA 2019 IRS Form 990				X
291.0 0	10/15/2021	Amended Expert Report of Daniel L. Jackson				X
291.0 1	1/1/2018	Loesch Agreement	AMc-000055			X
291.0 2	6/21/2019	Mutual of Omaha Billing Statement	AMc-001335		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.0 3	12/24/2020	List of Late Payments	AMc-002628			X
291.0 4	9/4/2018	Valinksyi Employment Agreement	AMc-036766			X
291.0 5	5/1/2019	AMc Production Invoice No. 166346	AMc-041862		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.0 6	5/1/2019	AMc Production Invoice No. 166340	AMc-041863		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.0 7	5/1/2019	AMc Production Invoice No. 166339	AMc-041869		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.0 8	5/17/2019	AMc Production Invoice No. 166804	AMc-041994		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.0 9	6/1/2019	AMc Production Invoice No. 167037	AMc-042051		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.1 0	5/1/2019	AMc Production Invoice No. 166340	AMc-042136		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.1 1	9/10/2018	Mutual of Omaha Billing Statement	AMc-057610			X
291.1 2	7/17/2018	Prudential EFT Notice	AMc-058265			X
291.1 3	4/15/2019	AMc Production Invoice No. 166104	AMcTX-00019289		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.1 4	12/12/2018	Virginia Lease Agreement	AMcTX-00036891			X
291.1 5	10/18/2019	CenturyLink Disconnect Request	AMcTX-00045364		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.1 6	7/16/2019	AT&T Account Statement	AMcTX-00045368		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
291.1 7	10/8/2019	CenturyLink Invoice No. 85349561	AMcTX-00045395		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.1 8	4/30/2018	Cisco Lease Agreement	AMcTX-00045403			X
291.1 9	5/8/2018	Dell Financial Services Lease Agreement	AMcTX-00045408			X
291.2 0	3/22/2018	iLand Internet Solutions Work Order	AMcTX-00045414			X
291.2 1	8/1/2019	Rent Invoice No. 208	AMcTX-00045456		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.2 2	9/11/2019	AT&T Invoice No. 2854499405	AMcTX-00045457		The NRA objects to AMc's use of this document at trial. AMc failed to produce a	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					<p>privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
291.2 3	9/19/2019	AT&T Invoice No. 5048360507	AMcTX-00045459		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
291.2 4	10/19/2018	Email from Lacey Duffy to Trey Rick and Mark Ackerman	AMcTX-00045461			X
291.2 5	1/15/2019	AMc Production Invoice No. 163943	AMcTX-00045467			X
291.2 6	12/2/2019	AMc Production Invoice No. 171144	AMcTX-00045468		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					<p>the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
291.2 7	12/2/2019	AMc Production Invoice No. 171498	AMcTX-00045469		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
291.2 8	12/2/2019	AMc Production Invoice No. 170464	AMcTX-00045470		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
291.2 9	6/12/2019	AMc Production Invoice No. 167453	AMcTX-00045496		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
291.3 0	7/9/2019	AMc Production Invoice No. 168015	AMcTX-00045502		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
291.3 1	10/10/2019	AMc Production Invoice No. 170388	AMcTX-00045503		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p>	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.3 2	9/12/2019	AMc Production Invoice No. 169524	AMcTX-00045504		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.3 3	5/30/2017	Colorado Springs Third Amendment to Lease	AMcTX-00045510			X
291.3 4		TLUX CORP Invoice No. 1009	AMcTX-00045515			X
291.3 5	10/2/2019	Colorado Springs Commercial Sublease	AMcTX-00045516		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					discovery period, when the NRA could have made use of it.	
291.3 6		Attorney Correspondence and Legal Invoices	AMcTX-00046071-46167			X
291.3 7	10/18/2019	A-1 Freeman Moving & Storage Invoice No. O-296-19/71615	AMcTX-00046168		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.3 8	12/30/2019	A-1 Freeman Moving & Storage Invoice No. O-283-19/74590	AMcTX-00046169		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.3 9	11/8/2019	Homewood Suites Receipt	AMcTX-00046170		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					<p>not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
291.4 0	11/7/2019	AMc Expense Report	AMcTX-00046171		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
291.4 1	11/8/2019	Account Statement	AMcTX-00046172		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
291.4 2	2/4/2020	Concur Expense Report	AMcTX-00046173		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
291.4 3	3/3/2020	Concur Expense Report	AMcTX-00046179		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
291.4 4	11/5/2019	Concur Expense Report	AMcTX-00046199		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p>	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.4 5	11/14/2019	Concur Expense Report	AMcTX-00046213		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.4 6	3/20/2020	Move it All Services Receipt	AMcTX-00046257		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.4 7	3/12/2020	UPS Store Receipt	AMcTX-00046259		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.4 8	10/29/2019	Xerox Invoice No. 162889933	AMcTX-00046260		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.4 9	10/29/2019	Xerox Invoice No. 162890034	AMcTX-00046261		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
291.5 0	10/29/2019	Xerox Invoice No. 162890544	AMcTX-00046262		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.5 1	10/29/2019	Xerox Invoice No. 162890548	AMcTX-00046263			X
291.5 2	5/30/2017	Colorado Springs Third Amendment to Lease	AMcTX-00046265			X
291.5 3		TLUX CORP Invoice No. 1009	AMcTX-00046269			X
291.5 4	1/13/2021	Email from Tyson Hartshorn to JJ Treadwell, Bill Winkler, and Mike Dennehy	AMcTX-00046274			X
291.5 5	12/31/2019	Gaedeke Group Operation Expenses Reconciliation	AMcTX-00046286		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					discovery period, when the NRA could have made use of it.	
291.5 6	7/19/2016	McKinney Avenue First Amendment to Office Lease	AMcTX-00046290			X
291.5 7	9/22/2017	North Union Street Seventh Amendment to Lease Agreement	AMcTX-00046341			X
291.5 8	3/17/2020	North Union Street Termination of Lease Agreement	AMcTX-00046350		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.5 9	1/6/2020	Colonial Parking Invoice No. 2821477	AMcTX-00046366		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
291.6 0	6/27/2019	Email from Caile Turner to Bill Winkler, Brandon Winkler, JJ Treadwell, and Clay Turner	AMcTX-00046367		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.6 1	7/1/2020	Letter from Nadine Goering (Niebur Development) to AMc	AMcTX-00046368		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.6 2	3/20/2020	Stream Realty Invoice No. SWDC26819.0	AMcTX-00046369		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.6 3	2/6/2020	Colonial Parking Invoice No. 2848731	AMcTX-00046370		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.6 4	3/6/2020	Colonial Parking Invoice No. 1837035	AMcTX-00046371		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.6 5		COBRA Premium Reconciliations	AMcTX-00046372			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
291.6 6		Parking Details	AMcTX- 00046373			X
291.6 7	10/17/2019	CenturyLink Invoice No. 85513654	AMcTX- 00046374		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.6 8	1/6/2020	Leave Severance	AMcTX- 00046381		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.6 9		Employee Census	AMcTX- 00046382			X
291.7 0	5/3/2019	Axis Corporate Security Invoice No. #AM 0591-1	AMcTX- 00046389		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					<p>not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
291.7 1	6/12/2019	AMc Production Invoice No. 167453	NRA- AMc_00079126		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
291.7 2	6/12/2019	AMc Production Invoice No. 167448	NRA- AMc_00079132		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
291.7 3	4/30/2017	2017 Services Agreement	NRA- AMc_00050600			X
291.7 4	5/6/2018	2018 Amendment to Services Agreement	AMc-056592			X
291.7 5	5/1/1999	1999 Services Agreement	NRA- AMc_00048503			X
291.7 6	5/15/2018	Oliver North Employment Agreement	AMc-056595			X
291.7 7	1/1/2019	Amendment to Oliver North Employment Agreement	AMc-059822			X
291.7 8	5/29/2019	Letter from Revan McQueen to Andrew Arulanandam	NRA- AMc_00059931		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
291.7 9	6/25/2019	Letter from Andrew Arulanandam to Revan McQueen	NRA- AMc_00060185			X
291.8 0	3/10/2021	Topic No. 751 Social Security and Medicare Withholding Rates – Internal Revenue Service				X
291.8 1	3/8/2021	Topic No. 759 Form 940 – Employer's Annual Federal Unemployment (FUTA) Tax Return – Filing and Deposit Requirements – Internal Revenue Service				X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
292.0 0	7/1/21	Rebuttal Expert Report by Dr. Richard Bergin			The entire report is unsworn and therefore constitutes inadmissible hearsay. The NRA reserves the right to challenge testimony concerning the opinions stated in this report on the basis that it fails to meet the standards for admissible expert testimony.	
292.0 1		NRATV Video Analytics Dashboard: Solution Overview	AMc-002656		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
292.0 2	10/9/2018	NRATV 2018 YTD: Analytics Executive Overview	AMc-002700		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					from the social media accounts, to which the NRA has also been denied access.	
292.0 3	3/31/2018	NRATV Q1 2018: Analytics & Valuation	AMc-002713		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
292.0 4	10/3/2018	NRATV YTD Q3'18 Talent Earned Media Valuation: Mass Media Approach	AMc-002786		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
292.0 5	8/31/2017	NRATV Analytics Discussion	AMc-002818		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
292.0 6	4/7/2019	NRATV 2019 Update	AMc-002844		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
292.0 7	8/31/2017	The Clenched Fist of Truth	AMc-002929		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
292.0 8	12/20/2017	NRATV: America's Most Patriotic Team in News	AMc-002957		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
292.0 9		NRATV Q3 2017 YTD Metrics	AMc-002974		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
292.1 0	12/31/2017	NRATV 2017 Metrics	AMc-039154		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
292.1 1	12/31/2017	NRATV 2017 Metrics	AMc-039158		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
292.1 2	12/31/2017	NRATV 2017 Metrics	AMc-039162		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
292.1 3	13/31/2018	NRATV 2018 Metrics	AMc-040053		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
292.1 4	4/25/2019	Email from Eric Van Horn to NRA	AMc-041806		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					from the social media accounts, to which the NRA has also been denied access.	
292.1 5	4/15/2019	NRATV Q1 2019 Metrics	AMc-041807		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
292.1 6	5/1/2019	NRATV 2019 Update	AMcTX-00003282		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it. Additionally, the following objections apply: FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
292.1 7		The Power of NRATV: Crafting and Owning a Narrative	AMcTX-00045966		FRE 901 – Lack of Proper Authentication FRE 802 – Hearsay The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.	
292.1 8	4/10/2019	Email from Andrew Arulanandam to Melanie Montgomery and Revan McQueen	NRA-AMc_00059409			X
292.1 9	5/9/2019	Email from Andrew Arulanandam to Melanie Montgomery and Henry Martin	NRA-AMc_00059652			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
292.2 0	5/13/2019	Email from Andrew Arulanandam to Melanie Montgomery and Nader Tavangar	NRA-AMc_00124518			X
292.2 1		Data file for PIP Dashboard	PIP-00000214_native		The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data. It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)	
292.2 2		Data file for PIP Dashboard	PIP-00000215_native		The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data. It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)	
292.2 3		Data file for PIP Dashboard	PIP-00000216_native		The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					<p>the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>	
292.2 4		Data file for PIP Dashboard	PIP-00000218_native		<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>	
292.2 5		Data file for PIP Dashboard	PIP-00000219_native		<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>	
292.2 6		Data file for PIP Dashboard	PIP-00000220_native		<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not</p>	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data. It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)	
292.2 7		Data file for PIP Dashboard	PIP-00000246_native		The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data. It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)	
292.2 8		Data file for PIP Dashboard	PIP-00000287_native		The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data. It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)	
292.2 9		Data file for PIP Dashboard	PIP-00000288_native		The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data. It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)	
292.3 0		Data file for PIP Dashboard	PIP-00000289_native		The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data. It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)	
292.3 1		Data file for PIP Dashboard	PIP-00000290_native		The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data. It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)	
292.3 2		Data file for PIP Dashboard	PIP-00000291_native		The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					<p>file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>	
292.3 3		Data file for PIP Dashboard	PIP-00001190_native		<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>	
292.3 4		Data file for PIP Dashboard	PIP-00001196_native		<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>	
292.3 5		Data file for PIP Dashboard	PIP-00001283_native		The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					<p>which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>	
292.3 6		Data file for PIP Dashboard	PIP-00001294_native		<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>	
292.3 7		Data file for PIP Dashboard	PIP-00001322_native		<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
292.3 8		Data file for PIP Dashboard	PIP-00001339_native		<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>	
292.3 9		Data file for PIP Dashboard	PIP-00001348_native		<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>	
292.4 0		Data file for PIP Dashboard	PIP-00002807_native		<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p>	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)	
292.4 1		Data file for PIP Dashboard	PIP-00002890_native		The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data. It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)	
292.4 2		Data file for PIP Dashboard	PIP-00004232_native		The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data. It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)	
292.4 3		Data file for PIP Dashboard	PIP-00004365_native		The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					<p>the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>	
292.4 4		Data file for PIP Dashboard	PIP-00004392_native		<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>	
292.4 5	5/1/2002	NRA-ILA 2002 NRA Annual Meeting Speech By Wayne LaPierre				X
292.4 6		Vanity Metrics: Definition, How To Identify Them, and Examples				
293.0 0	10/29/21	Supplemental Rebuttal Expert Report by Dr. Richard Bergin			<p>The entire report is unsworn and therefore constitutes inadmissible hearsay.</p> <p>The NRA reserves the right to challenge testimony concerning the opinions stated in this report on the basis that it fails to meet the standards for admissible expert testimony.</p>	
293.0 1		2018 and 2019 Budget Comparisons	AMcTX-00065376-95395			X
293.0 2		2018 Budget	AMcTX-00065392			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
294.0 0	7/1/21	Rebuttal Expert Report of Daniel L. Jackson			The entire report is unsworn and therefore constitutes inadmissible hearsay. The NRA reserves the right to challenge testimony concerning the opinions stated in this report on the basis that it fails to meet the standards for admissible expert testimony.	
294.0 1	1/1/2018	Dana Loesch Employment Agreement	AMc-000055			X
294.0 2	2/23/2016	Email from Melanie Montgomery to Trisha Parker	AMc-000155			X
294.0 3	2/22/2016	Email from Melanie Montgomery to Hayley Holmes	AMc-000177			X
294.0 4	6/1/2019	AMc Production Invoice No. 167037	AMc-042051		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
294.0 5	5/6/2018	Amendment No. 1 to Services Agreement	AMc-056592			X
294.0 6	5/15/2018	Oliver North Employment Agreement	AMc-056595			X
294.0 7	1/1/2019	Amendment Number One to Oliver North Employment Agreement	AMc-059822			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
294.0 8	4/6/2018	Email from Kelsey Gosdin to Christy DeGuisti, Bill Winkler, and Brandon Winkler	AMcTX-00001636			X
294.0 9	12/31/2016	AMc Consolidated Statement of Income	AMcTX-00053145			
294.1 0	12/31/2016	AMc Labor Breakdown	AMcTX-00053147			
294.1 1	12/31/2016	All GL Companies: Corporate Profit & Loss	AMcTX-00053157			
294.1 2	12/31/2017	AMc Consolidated Statement of Income	AMcTX-00053164			
294.1 3	12/31/2017	AMc Labor Breakdown	AMcTX-00053166			
294.1 4	12/31/2017	All GL Companies: Corporate Profit & Loss	AMcTX-00053176			
294.1 5	12/31/2018	AMc Consolidated Statement of Income	AMcTX-00053183			
294.1 6	12/31/2018	AMc Labor Breakdown	AMcTX-00053185			
294.1 7	12/31/2018	All GL Companies: Corporate Profit & Loss	AMcTX-00053196			
294.1 8	12/31/2019	AMc Consolidated Statement of Income	AMcTX-00053204		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					discovery period, when the NRA could have made use of it.	
294.1 9	12/31/2019	AMc Labor Breakdown	AMcTX-00053206		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
294.2 0	12/31/2019	All GL Companies: Corporate Profit & Loss	AMcTX-00053216		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
294.2 1	11/25/2019	COGS General Ledger	AMcTX-00053224		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					<p>the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
294.2 2	11/30/2019	Invoice General Ledger	AMcTX-00053225		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
294.2 3	5/1/2019	Invoice Breakdown	AMcTX-00053226		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
294.2 4	12/31/2016	Edward Selfridge 2016 W-2	AMcTX- 00053241			X
294.2 5	12/31/2016	Ginny Simone 2016 W-2	AMcTX- 00053242			X
294.2 6	12/31/2017	Edward Selfridge 2017 W-2	AMcTX- 00053243			X
294.2 7	12/31/2017	Virginia Simone 2017 W-2	AMcTX- 00053244			X
294.2 8	12/31/2018	Collins Idehen 2018 W-2	AMcTX- 00053245			X
294.2 9	12/31/2018	Edward Selfridge 2018 W-2	AMcTX- 00053246			X
294.3 0	12/31/2018	Grant Stinchfield 2018 W-2	AMcTX- 00053247			X
294.3 1	12/31/2018	Virginia Simone 2018 W-2	AMcTX- 00053248			X
294.3 2	12/31/2019	Collins Idehen 2019 W-2	AMcTX- 00053249		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
294.3 3	12/31/2019	Edward Selfridge 2019 W-2	AMcTX- 00053250		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					<p>during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
294.3 4	12/31/2019	Grant Stinchfield 2019 W-2	AMcTX-00053251		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
294.3 5	5/1/1999	Services Agreement	NRA-AMc_00048503			X
294.3 6	4/30/2017	2017 Services Agreement	NRA-AMc_00050600			X
294.3 7	5/7/2018	Minutes of the Meeting of the Board of Directors of the NRA	NRA-AMc_00075497			X
294.3 8	1/13/2018	Minutes of the Meeting of the Board of Directors of the NRA	NRA-AMc_00076056			X
294.3 9	9/8/2018	Minutes of the Meeting of the Board of Directors of the NRA	NRA-AMc_00077292			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
294.4 0	6/12/2019	AMc Production Invoice No. 167453	NRA- AMc_00079126		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
294.4 1	6/12/2019	AMc Production Invoice No. 167448	NRA- AMc_00079132		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>	
295	10/15/2021	Supplemental Rebuttal Expert Report of Daniel L. Jackson			<p>The entire report is unsworn and therefore constitutes inadmissible hearsay.</p> <p>The NRA reserves the right to challenge testimony concerning the opinions stated in this report on the basis that it fails to meet the standards for admissible expert testimony.</p>	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
296		Media Buy Transaction Ledger	AMcTX-00067935		The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.	
297		PIP Dashboard https://qlik-sense.am.com User: qlik-sense/review PW: [confidential]			The NRA objects to AMc's use of this "exhibit." The PIP Dashboard is the property of the NRA and is being wrongfully withheld by AMc and its counsel. This is the subject of the NRA's conversion claim. Because the NRA has not been provided with administrative access to the PIP Dashboard, there is an unreasonable risk that data displayed to the jury will be manipulated or otherwise unreliable.	
298	11/11/2019	Dorsey & Whitney LLP Invoices (NRA-Related Government Proceedings)	AMcTX-00046093		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
299		2018 Budget – Revised	NRA-AMc_00200745			X
300	4/4/2019	McDermott Will & Emery Invoices	AMcTX-00066478			X
301	7/31/2018	Email from Craig Spray to Melanie Montgomery, Bill Winkler, and Lacey Cremer	NRA-AMc_00042157			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
302	9/21/2018	Email from Lisa Supernaugh to AMc	NRA-AMc_00068513			X
303	6/12/2019	Email from Nader Tavangar to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	NRA-AMc_00079124		The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver. AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.	
304	5/8/2019	Email from Wayne LaPierre to Mark Dycio	NRA-AMc_00199663			
305	1/5/2021	Schertler & Onorato LLP Invoices	AMcTX-00066557			X
306	4/16/2019	AMc Text Messages	AMcTX-00339383		The NRA objects to AMc's use of this exhibit at trial. This document is a compilation of text messages which were never produced in native form. AMc's counsel refuses to provide native versions of these communications.	
307	9/14/2021	Letter from Sonya Rowling to NRA Finance Committee			Relevance (FRE 401-402) More Prejudicial Than Probative (FRE 403) This is a confidential document which is the property of the NRA. This document was obtained without the consent or authorization of the NRA.	
308	6/25/2018	Email from Christy DeGiusti to Bill Winkler	AMc-057237			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
309	7/6/2018	Email from Joshua McNear to AMc	AMc-058731			X
310	4/26/2018	Email from Erin Kelly to Kelsey Gosdin, Melanie Montgomery, and Lacey Duffy	AMc-059049			X
311	2/22/2019	Email from Craig Spray to Nader Tavangar and Bill Winkler	AMc-040505			X
312	10/9/2018	2018 NRA Budget	NRA-AMC_00200767			X
313	2/27/2019	Email from Craig Spray to Melanie Montgomery, Bill Winkler, and Brandon Winkler	AMcTX-00000410			X
314	12/21/2018	Email from Craig Spray to Bill Winkler	AMcTX-00000367			X
315	4/6/2018	Email from Kelsey Gosdin to Christy DeGiusti, Bill Winkler, and Brandon Winkler	AMcTX-00001636			X
316	4/25/2018	Email from Kelsey Gosdin to Erin Kelly	AMcTX-00004834			X
317	4/26/2018	Email from Hayley Holmes to Lacey Duffy, Kari Griffith, Joshua McNear, Jordan Underwood, and Tyler Petersen	AMcTX-00004866			X
318	4/27/2018	Email from Kari Griffith to Hayley Holmes, Lacey Duffy, Joshua McNear, Jordan Underwood, and Tyler Petersen	AMcTX-00004873			X
319	5/18/2018	Email from Hayley Holmes to Lacey Duffy	AMcTX-00004952			X
320	8/27/2019	Letter from Andrew Arulanandam to Revan McQueen	NRA-AMC-TX00000010			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
321	8/3/2018	Email from Kari Griffith to FOX News	AMcTX-00005279			X
322	11/1/2018	Email from Kelsey Gosdin to Melanie Montgomery, Lacey Duffy, and Jesse Greenberg	AMcTX-00005991			X
323	6/30/2016	Email from Erin Kelly to Trisha Parker, Lacey Duffy, and Melanie Montgomery	AMcTX-00271412			X
324	7/21/2017	Cumulus-Dallas KPLX-FM / Mid-Mid Spot Times by Account	AMcTX-00335989			X
325	7/20/2017	KLUV-FM Spot Details	AMcTX-00335991			X
326	7/21/2017	iHeart Media Order No. 1119259331	AMcTX-00335993			X
327	7/22/2017	All Regular Spots: Internet, KKDA-AM, KKDA-FM, KRNB-FM	AMcTX-00335996			X
328	7/24/2017	Email from Eric Wang to Patrick Kobler	AMcTX-00336002			X
329	1/31/2019	EFT Payment to AMc	NRA-AMc_0079008			X
330	12/31/2002	AMc "Audit" Process and Findings	NRA-AMc_00089371			X
331	12/31/2001	AMc "Audit" Process and Findings	NRA-AMc_00137590			X
332	12/31/2014	AMc "Audit" Process and Findings	NRA-AMc_00185505			X
333	12/31/2007	AMc "Audit" Process and Findings	NRA-AMc_00185508			X
334	12/31/2004	AMc "Audit" Process and Findings	NRA-AMc_00185512			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
335	12/31/2005	AMC "Audit" Process and Findings	NRA-AMC_00185515			X
336	5/6/2018	Amendment No. 1 to Services Agreement	NRA-AMC_00057325			X
337		NRA Travel and Business Expense Reimbursement Policy				
338	8/28/2018	Email from Josh Powell to Melanie Montgomery and Lacey Duffy	AMcTX-00000703			
339	6/30/2018	WBB Investments Account Statement	AMcTX-00002406			X
340	5/31/2018	WBB Investments Account Statement	AMcTX-00002407			X
341	5/30/2018	Check to WBB Investments No. 633597	AMcTX-00002457			X
342	6/14/18	Check to NRA from WBB Investments	AMcTX-00002459			X
343	5/11/2018	Company Agreement of WBB Investments, LLC	AMcTX-00002989			X
344	6/28/2018	Letter from Andrew Arulanandam to David Schertler	NRA-AMC_00065184			
345	11/29/2018	EFT Payment to AMC	NRA-AMC_00193696			X
346	12/27/2018	EFT Payment to AMC	NRA-AMC_00193703			X
347	12/19/2018	EFT Payment to AMC	NRA-AMC_00193736			X
348	8/20/2019	Plaintiff's Responses and Objections to Defendant Ackerman McQueen, Inc.'s First Set of Interrogatories				

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
349	1/7/2019	Email from Lisa Supernaugh to Craig Spray	NRA-AMc_00135444			X
350	4/29/2019	NRA Report of the Audit Committee	DB_0013			X
351	4/10/2019	Email from Andrew Arulanandam to Melanie Montgomery and Revan McQueen	NRA-AMc_00059409			
352	3/5/2018	Brewer Firm Engagement Letter				X
353		Inside the NRA by Joshua L. Powell			Portions of this book will be inadmissible as Hearsay (FRE 802).	
354	6/22/2020	Order Denying NRA's Motion to Enter Proposed Protective Order for Non-Parties				X
355	4/9/2019	Email from Melanie Montgomery to Andrew Arulanandam	NRA-AMc_00059407			X
356	2/8/2016	Wayne LaPierre Financial Disclosure Questionnaire (2016-21)	NRA-NYAG-00009723		Relevance (FRE 401-402) More Prejudicial Than Probative (FRE 403)	
357	7/24/2021	AMc's Amended Notice of Intention to Take Oral Deposition of Corporate Representative(s) of the NRA				
358	10/29/2021	NRA Objections and Responses to AMc's First Set of Interrogatories				
359	10/29/2021	NRA Objections and Responses to AMc's First Set of Requests for Admission				
360	7/26/2018	Compliance Meeting Sign-In Sheets	NRA-BK-00058015			X
361	3/11/2020	NRA Financial Statements as of December 31, 2019 and 2018				X
362	1/30/2020	Letter from John Frazer to Joshua Powell	NRA-NYAG-00052610			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
363	9/10/2020	NRA's Amended Response with Counterclaims Against Christopher Cox (CPR File: G-21-05-S)			Relevance (FRE 401-402) More Prejudicial Than Probative (FRE 403) This is a confidential document from an arbitration proceeding involving the NRA. This document was obtained without the consent or authorization of the NRA.	
364		CharityBuzz: Illusions Luxury Yacht Charter			Relevance (FRE 401-402) More Prejudicial Than Probative (FRE 403)	
365	3/7/2019	Email from Melanie Montgomery to Craig Spray and Nader Tavangar	AMc-001275			X
366	12/5/2016	Corporate America Aviation, Inc. Invoice No. 010317ROA			Relevance (FRE 401-402) More Prejudicial Than Probative (FRE 403)	
367	5/28/2020	Letter from Richard Childress to NRA Hearing Board				X
368	4/29/2019	NRA Points of Concern	NRA-AMc_00059590		Relevance (FRE 401-402) More Prejudicial Than Probative (FRE 403) The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.	
369	4/10/2019	Email from Melanie Montgomery to Wayne LaPierre	AMcTX_00000845			X
370	8/15/2016	Letter from Performance Improvement Partners to Jesse Greenberg	PIP-00003755			
371	3/30/2017	Email from Bill Winkler to Steve Hart	Hart Ex. 17			X
372	1/2/2018	Email from Joshua Powell to Tony Makris	Hallow Ex. 14			X

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
373		AMC's 2017 NRA Budget & 2018 Proposed NRA Budget	AMC-TX-00064822			X
374	6/4/2019	Email from Craig Spray to Lisa Supernaugh	NRA-AMC_00065108			X
375	4/1/2018	America's First Freedom			FRE 401-402 – Relevance. The magazine doesn't have anything to do with the disputed factual issues of the case. FRE 802 – Hearsay.	
376	2/3/2022	The Reload: NRA Revenues Cut in Half Since 2018, Legal Spending Spiked in 2021			FRE 401-402 – Relevance. The article doesn't have anything to do with the disputed factual issues of the case. FRE 802 – Hearsay	
377	5/1/2018	Mother Jones: NRA Leader Once Worked for Professor Who Claimed Blacks Were Genetically Inferior			FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its introduction will outweigh any conceivable probative value. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	
378	5/5/2018	Daily Kos: NRA Board member exposed as ex-assistant of infamous racist William Shockley			FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its introduction will outweigh any conceivable probative value. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	
379	9/26/2019	New York Times: Who Paid for the NRA's Special Projects' Trip to Russia?			FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
					introduction will outweigh any conceivable probative value. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	
380	4/6/2021	The Washington Post: After school shootings, NRA exec sought refuge on 108-foot yacht: ‘Thank God I’m safe’			FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its introduction will outweigh any conceivable probative value. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	
381	8/1/2019	The Washington Post: Three NRA board members resign in latest sign of upheaval at gun rights group			FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its introduction will outweigh any conceivable probative value. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	
382	8/4/2018	New York Times: Beyond the NRA: Maria Butina’s Peculiar Bid for Russian Influence			FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its introduction will outweigh any conceivable probative value. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
383	5/11/2021	CNN: Judge dismisses NRA's bankruptcy petition, allowing New York AG lawsuit to move forward			FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its introduction will outweigh any conceivable probative value. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	
384	7/30/2019	The New Yorker: New Documents Raise Ethical and Billing Concerns About the NRA's Outside Counsel			FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its introduction will outweigh any conceivable probative value. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	
385	6/9/2019	The Washington Post: NRA money flowed to board members amid allegedly lavish spending by top officials and vendors			FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its introduction will outweigh any conceivable probative value. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	
386	5/7/2019	The New Yorker: An Internal Memo Raises New Questions About Self-Dealing at the NRA			FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its introduction will outweigh any conceivable probative value. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
387	8/18/2019	The Washington Post: How a hard-charging lawyer helped fuel a civil war inside the NRA			FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its introduction will outweigh any conceivable probative value. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay and Hearsay Within Hearsay	
388	11/30/2018	Wall Street Journal: NRA Awarded Contracts to Firms with Ties to Top Officials			FRE 403 – More Prejudicial Than Probative. This article contains statements likely to unfairly prejudice the jury against the NRA. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	
389	11/24/2020	The Trace: Ex-NRA Execs Fear Attorney Is Shielding LaPierre at the Group's Expense			FRE 403 – More Prejudicial Than Probative. This article contains statements likely to unfairly prejudice the jury against the NRA and NRA's counsel. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	
390	3/2/2020	The Trace: The NRA Exodus: Who Left the Organization During a Year of Upheaval			FRE 403 – More Prejudicial Than Probative. This article contains statements likely to unfairly prejudice the jury against the NRA and NRA's counsel. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
391	9/27/2019	Rolling Stone: Senate Report on NRA/Russia Connections Brands the Gun Group a “Foreign Asset”			FRE 403 –More Prejudicial Than Probative. This article contains statements likely to unfairly prejudice the jury against the NRA due to associations with Russia. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	
392	7/29/2021	The New Yorker: How the Head of the NRA and His Wife Secretly Shipped Their Elephant Trophies Home			FRE 403 – More Prejudicial Than Probative. This article contains statements likely to unfairly prejudice the jury against the NRA. FRE 401-402 – Relevance. This article is not probative to any disputed factual issue. FRE 802 – Hearsay	
393	7/14/2020	Email from Jay Madrid to Michael Collins			FRE 401-402 – Relevance. This is a routine discovery-related email regarding deposition scheduling and has little, if any, probative value.	
394		[Intentionally Omitted]				
395		[Intentionally Omitted]				
396		[Intentionally Omitted]				
397		[Intentionally Omitted]				
398		[Intentionally Omitted]				
399		[Intentionally Omitted]				
400	9/24/2019	**Deposition of Wayne LaPierre (Virginia) ¹				
400.1	6/17-18/2020	**Deposition of Wayne LaPierre (NYAG)				

¹ Any exhibit with “**” preceding the description is being presently listed and identified for reference purposes only. However, AMc reserves the right to offer all or part of these documents and/or testimony at the trial.

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
400.2	3/22/2021	**Deposition of Wayne LaPierre (BR – Vol I)				
400.3	3/22/2021	**Deposition of Wayne LaPierre (BR – Vol II)				
400.4	8/21/2021	**Deposition of Wayne LaPierre (Texas)				
400.5	5/3/2020	**Wayne LaPierre Declaration				
400.6	8/3/2021	**Wayne LaPierre Declaration				
400.7	9/1/2021	**Wayne LaPierre Declaration				
400.8	12/20/2021	**Wayne LaPierre Declaration				
401	10/2/2019	**Deposition of Andrew Arulanandam (Virginia)				
401.1	8/27/2021	**Deposition of Andrew Arulanandam (30(b)) - Texas)				
401.2	4/14/2020	**Andrew Arulanandam Declaration				
401.3	5/1/2020	**Andrew Arulanandam Declaration				
401.4	6/14/2020	**Andrew Arulanandam Declaration				
401.5	8/3/2021	**Andrew Arulanandam Declaration				
401.6	9/1/2021	**Andrew Arulanandam Declaration				
401.7	12/20/2021	**Andrew Arulanandam Declaration				
402	1/31/2022	**Deposition of William A. Brewer, III				
403	8/11/2021	**Deposition of Skye McQueen Brewer				
404	3/4/2020	**Travis Carter Declaration				
404.1	4/14/2020	**Travis Carter Declaration				
404.2	5/4/2020	**Travis Carter Declaration				

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
405	2/7/2020	**Deposition of Charles Cotton (Virginia)				
405.1	6/2/2020	**Deposition of Charles Cotton (NYAG)				
405.2	3/27/2021	**Deposition of Charles Cotton (BR – Vol I)				
405.3	3/28/2021	**Deposition of Charles Cotton (BR – Vol II)				
405.4	4/30/2020	**Charles Cotton Declaration				
405.5	8/3/2021	**Charles Cotton Declaration				
405.6	12/20/2021	**Charles Cotton Declaration				
406	7/27/2021	**Deposition of Christopher Cox				
407	7/28/2021	**Deposition of Susan Dillon				
407.1	8/7/2020	**Susan Dillon Declaration				
408	2/12/2020	**Deposition of Michael Erstling (NYAG)				
408.1	8/27/2021	**Deposition of Michael Erstling (Texas)				
408.2	4/29/2020	**Michael Erstling Declaration				
408.3	1/21/2022	**Michael Erstling Declaration				
409	1/16/2020	**Deposition of John Frazer (Virginia)				
409.0 1	3/15/2021	**Deposition of John Frazer (BR)				
409.0 2	3/18/2021	**Deposition of John Frazer (BR)				
409.0 3	8/19/2021	**Deposition of John Frazer (Texas)				

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
409.0 4	8/30/2021	**Deposition of John Frazer (Texas)				
409.0 5	10/23/2019	**John Frazer Declaration				
409.0 6	5/1/2020	**John Frazer Declaration				
409.0 7	8/3/2021	**John Frazer Declaration				
409.0 8	8/3/2021	**John Frazer Declaration				
409.0 9	9/1/2021	**John Frazer Declaration				
409.1 0	11/29/2021	**John Frazer Declaration				
409.1 1	12/20/2021	**John Frazer Declaration				
410	8/2/2021	**Todd Grable Declaration				
410.1	9/1/2021	**Todd Grable Declaration				
411	1/10/2021	**Deposition of Millie Hallow (Virginia)				
412	2/4/2020	**Deposition of Steve Hart (Virginia)				
412.1	7/26/2021	**Deposition of Steve Hart (Texas)				
413	12/18/2021	**Declaration of William McLaughlin				
413.1	1/24/2022	**Declaration of William McLaughlin				
414	1/29/2020	**Deposition of Carolyn Meadows				
414.1	8/3/2021	**Carolyn Meadows Declaration				

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
414.2	8/31/2021	**Carolyn Meadows Declaration				
415	12/18/2021	**Deposition of Oliver North (Virginia/Texas)			The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.	
415.1	9/15/2021	**Deposition of Oliver North (Texas)			The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.	
416	8/30/2021	**Deposition of Woody Phillips (Texas – Vol I)				
416.1	10/20/2021	**Deposition of Woody Phillips (Texas – Vol I)				
417	1/30/2020	**Deposition of Sonya Rowling (NYAG)				
417.1	3/19/2021	**Deposition of Sonya Rowling (BR)				
418	11/2/2020	**Deposition of Tyler Schropp (UWS)				
419	12/20/2021	**Grant Spoffard Declaration				
420	10/3/2019	**Deposition of Craig Spray (Virginia)				
420.1	3/24/2021	**Deposition of Craig Spray (BR)				
420.2	5/4/2020	**Craig Spray Declaration				
421	1/30/2020	**Deposition of Lisa Supernaugh (Virginia)				
422	3/25/2021	**Deposition of Gayle Stanford (BR)				
423	8/12/2021	**Deposition of Rick Tedrick (Texas)				

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
423.1	12/19/2021	**Rick Tedrick Declaration				
424	9/18/2019	**Deposition of Michael Trahar (Virginia)				
424.1	8/7/2020	**Michael Trahar Declaration				
424.2	11/29/2021	**Michael Trahar Declaration				
425	8/5/2021	**Deposition of Lacey Duffy (Texas)			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
426	3/24/2021	**Deposition of Tony Makris (BR)			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
426.1	8/5/2021	**Deposition of Tony Makris (Texas)			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
426.2	6/3/2021	**Tony Makris Declaration			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
427	8/5/2021	**Deposition of Edmund Martin (Texas)			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
427.1	6/3/2020	**Edmund Martin Declaration			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
428	8/23/2021	**Deposition of Revan McQueen (Texas)			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
428.1	3/30/2020	**Revan McQueen Declaration			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
428.2	6/3/2020	**Revan McQueen Declaration			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
428.3	7/6/2021	**Revan McQueen Declaration			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
429	3/31/2021	**Deposition of Melanie Montgomery (BR – 30(b)(6))			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
429.1	8/4/2021	**Deposition of AMc 30(b)(6) (Texas) (Winkler/Darley/Montgomery)			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
429.2	8/6/2021	**Deposition of Melanie Montgomery (Texas)			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
429.3	6/3/2020	**Melanie Montgomery Declaration			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
430	8/2/2021	**Deposition of Bill Powers (Texas)			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
430.1	6/3/2020	**Bill Powers Declaration			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
431	8/4/2021	**Deposition of Nader Tavangar (Texas)			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
431.1	6/3/2020	**Nadar Tavangar Declaration			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
432	3/26/2021	**Deposition of Bill Winkler (BR – 30(b)(6))			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
432.1	3/26/2021	**Deposition of Bill Winkler (BR)			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
432.2	6/3/2020	**Bill Winkler Declaration			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
432.3	7/6/2021	**Bill Winkler Declaration			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
432.4	11/29/2021	**Bill Winkler Declaration			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
432.5	12/20/2021	**Bill Winkler Declaration			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
433	7/30/2021	**Deposition of Brandon Winkler			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
433.1	12/20/2021	**Brandon Winkler Declaration			The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.	
434	10/29/2021	**Deposition of Brian Buss				
434.1	6/1/2021	**Expert Report of Brian Buss				
434.2	10/21/2021	**Amended and Updated Report of Brian Buss				
435	10/21/2021	**Deposition of Andrew McLean				
435.1	6/1/2021	**Expert Report of Andrew McLean				

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
435.2	10/18/2021	**Supplemental Report of Andrew McLean				
436	8/17/2021	**Deposition of Gary Goolsby (Vol I)				
436.1	10/12/2021	**Deposition of Gary Goolsby (Vol II)				
436.2	6/1/2021	**Expert Report of Gary Goolsby				
436.3	8/16/2021	**Supplemental Expert Report of Gary Goolsby				
437	8/10/2021	**Deposition of Jonathan Hochman				
437.1	6/1/2021	**Expert Report of Jonathan Hochman				
437.2	10/22/2021	**First Supplemental Expert Report of Jonathan Hochman				
438	8/13/2021	**Deposition of Matthew Klink				
438.1	6/15/2021	**Expert Report of Matthew Klink				
439	8/19/2021	**Deposition of Autumn Krause				
439.1	6/15/2021	**Expert Report of Autumn Krause				
439.2	7/15/2021	**Expert Report of Autumn Krause				
440	8/12/2021	**Deposition of Larry Kanter				
440.1	7/15/2021	**Expert Report of Larry Kanter				
441	4/6/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Cotton)				
442	4/6/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Cotton / Frazer)				
443	4/7/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Frazer)				

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
444	4/7/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Frazer / LaPierre)				
445	4/8/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (LaPierre)				
446	4/8/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (LaPierre / Stanford / Rowling)				
447	4/13/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Rowling / Journey)				
448	4/13/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Journey / Spray)				
449	4/16/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Spray / Makris)				
450	4/16/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Makris / Winkler / Phillips (by transcript))				
451	4/20/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Owen Mills / Roscoe Marshall / Esther Schneider / Phillips (by transcript))				
452	4/20/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Meadows (by transcript) / Hallow (by transcript))				
453	4/21/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Lee)				

EX	Date	Description	Bates	Offered	NRA Objection	Pre-Admitted
454	4/21/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Lee / King)				
455	4/22/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Erstling / Wang / Schropp)				
456	4/22/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Schropp)				
457	4/23/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Froman / Rowling)				
458	4/23/2021	**PM Transcript of Proceedings in BK No. 21-30085-HDH-11 (Rowling)				
459	4/29/2021	**AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Plotts / LaPierre)				

AMc reserves the right to use additional exhibits not identified herein for purposes of rebuttal or impeachment. AMc also reserves the right to rely upon and use as evidence: (i) exhibits included on the exhibit list of any other parties in interest, and (ii) any pleading, hearing transcript, or other document filed with the Court in the above-captioned case or the Virginia litigation.

Date: February 25, 2022

Respectfully submitted,

/s/ Brian E. Mason

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COUNTER-PLAINTIFF**

Statement Pursuant to Paragraph 8 of the Scheduling Order

As to each of the exhibits on Ackerman McQueen's Amended Trial Exhibit List:

- (a) The NRA agrees to the admissibility of the exhibit (reserving the right to register objections pursuant to FRE 402 or 403), or
- (b) The NRA objects to the admissibility of the exhibit, as indicated in the column marked NRA objection on the exhibit list.

Dated: February 25, 2022

Respectfully submitted,

By: /s/ Philip J. Furia

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on all parties receiving notice by and through the Court's CM/ECF system on February 25, 2022.

/s/ Brian E. Mason
Brian E. Mason